

EXHIBIT A

GIBSON DUNN

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June 9, 2017

VIA ELECTRONIC MAIL

AUSA Jacquelyn P. Kasulis
AUSA Alixandra Smith
AUSA Karthik Srinivasan
U.S. Attorney's Office
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Greebel*, No. 15-cr-637 (KAM)

Dear Jackie, Alix, and Karthik:

We write to request copies of all grand jury subpoenas sent by your Office and/or the FBI after the superseding indictment was returned in the above-captioned case on or about June 3, 2016. Please notify us by no later than June 16, 2017 whether you intend to provide us with copies of those subpoenas.

Grand jury subpoenas are not confidential. *See* Mem. of Decision & Order at 4, *United States v. Gigliotti*, No. 15-cr-00204 (RJD) (E.D.N.Y. Dec. 23, 2015), Dkt. 114 (admonishing the government that “it was improper . . . to include [] Non-Disclosure Language in grand jury subpoenas issued to witnesses”). Indeed, in discovery in this case, the government produced a grand jury subpoena to NAV Consulting, Inc. *See* Exhibit A. Moreover, we note that a grand jury subpoena was filed on May 3, 2017 in the *United States v. Nordlicht* case on ECF by a defendant without objection from the government. *See* Exhibit B. Nevertheless, we are willing to apply to any grand jury subpoenas issued after the superseding indictment the same protective order issued on or about May 19, 2017 regarding the grand jury subpoenas to Retrophin.

GIBSON DUNN

June 9, 2017

Page 2

Thank you in advance for your attention and consideration to our request.

Sincerely,

/s/ Reed Brodsky

Reed Brodsky

cc: Counsel for Martin Shkreli